

14cv4562 DWF/FLN

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UNITED STATES DISTRICT COURT **BY MAIL**
DISTRICT OF MINNESOTA OCT 30 2014

Tanya Langama

Plaintiff(s),

CLERK, U.S. DISTRICT COURT
ST. PAUL, MN

vs. Dr. Buchwald,
Fairview On Hospital
North Memorial Hospital
Dr. Gregory J. Vitas
Dr. Nathan Noznecky

Case No. _____
(To be assigned by Clerk of District Court)

DEMAND FOR JURY TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in
this lawsuit. Please attach additional sheets
if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name TANYA Renee Langama
Street Address 5501 Boone Ave. North #202
County, City Hennepin, New Hope
State & Zip Code Minnesota, 55428
Telephone Number (612) 207-4014

SCANNED

OCT 30 2014

U.S. DISTRICT COURT ST. PAUL

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name North Memorial Hospital
Street Address 3300 Oakdale Ave. North
County, City Hennepin Robbinsdale
State & Zip Code Minnesota

b. Defendant No. 2

Name Dr. Gregory J. Vitas
Street Address 3366 Oakdale Ave N[#] 502
County, City Hennepin,
State & Zip Code Robbinsdale

c. Defendant No. 3

Name Dr. Nathan Noznesky
Street Address 1601 Golf Course Road
County, City ~~Itasca~~ Grand Rapids
State & Zip Code Minnesota

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name: TANYA R. LANGAM State of Citizenship: Citizen

Defendant No. 1: Dr. Gregory J. Vitas State of Citizenship: Citizen

Defendant No. 2: Dr. Nathan Noznesky State of Citizenship: Citizen

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☒ Defendant(s) reside in Minnesota

☒ Facts alleged below primarily occurred in Minnesota

☐ Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

① In paragraph 20-22 of the expert review it states how, where and when I was harmed.

5. Diversity of Citizenship
3. Dr. Henry Buchwald - Citizen
4. Dr. Norman Nozmesky - Citizen

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ST. PAUL, MN**

TANYALAN

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. Please refer to lines 20 - 22 of the expert review.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I am seeking a jury trial and I am disabled for the rest of my life. I would like to have a compensation of \$15,000,000. I believe this is a compensation that is well deserved with a life time of body injury.

Signed this 13th day of October 2014

Signature of Plaintiff

Janya R. Janopka

Mailing Address

55 01 Boone Ave. N #202
New Hope, MN 55428

Telephone Number

612-207-4014

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.